

United States District Court

WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Case Number: 17-MJ-00104-REL

RODNEY E. BROCK,
[DOB: 11/25/1996]



COUNT ONE:

Conspiracy to Commit Hobbs Act Robbery

18 U.S.C. §§ 1951 and 2

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

At all times material to this complaint, craigslist.org, backpage.com, and skout.com are Internet websites which function as avenues of interstate and foreign commerce by providing customers access to online classified advertisements and communications on and through their websites, and the Internet is the communication channel that people who make connections through craigslist.org, backpage.com, and skout.com use to communicate and transact business developed as a result of those connections, all affecting interstate and foreign commerce.

COUNT ONE

Between on or about April 1, 2015, and on or about June 7, 2016, in the Western District of Missouri, defendant **RODNEY E. BROCK** did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown, including with Kenneth Sexson, Sage Harrison, Nicole Covey, Devon Davis-Aumua, to unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in 18 U.S.C. § 1951, and the movement of the articles and commodities in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951, in that defendant **RODNEY E. BROCK** did knowingly

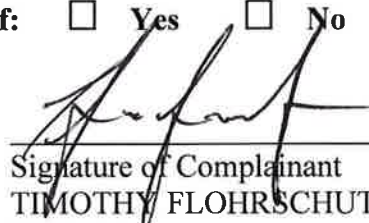
combine, conspire, confederate, and agree with others known and unknown, including with Kenneth Sexson, Sage Harrison, Nicole Covey, Devon Davis-Aumua, to intentionally and unlawfully take and obtain property consisting of electronics and United States Currency from individuals using craigslist.org, backpage.com, and skout.com by using these websites to make connections with customers of these websites, and then falsely communicating through these websites to arrange meetings with victims for the purpose of robbery, and such property was taken against each person's will by means of actual and threatened force, violence, and fear of injury, immediate and future, to each person.

All in violation of Title 18, United States Code, Section 1951.

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

(See attached affidavit.)

Continued on the attached sheet and made a part hereof: ☐ Yes ☐ No



Signature of Complainant
TIMOTHY FLOHRSCHUTZ
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

June 14, 2017
Date

at Kansas City, Missouri
City and State

HONORABLE ROBERT E. LARSEN
United States Magistrate Judge
Name and Title of Judicial Officer



Signature of Judicial Officer